

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

ROY S. MOORE,

Plaintiff,

V.

**TIANA LOWE, JERRY DUNLEAVY,)
TIMOTHY CARNEY, PHILLIP KLEIN,)
BRAD PUMBO, THE WASHINGTON)
NEWSPAPER PUBLISHING)
COMPANY, LLC, MEDIA D.C.,)
CLARITY MEDIA GROUP, PHILIP)
ANSCHUTZ, AND)
A, B, AND/OR C DEFENDANTS)
WHO OTHERWISE EXERCISED)
CONTROL OR DECISION)
MAKING OVER PUBLICATIONS)
WHICH ARE THE BASIS OF THIS)
LAWSUIT.)**

Defendants.

Case No. _____

STATEMENT OF RELATED CASE

Plaintiff Roy S. Moore, former Chief Justice of the Supreme Court of Alabama (“Judge Moore”), brought actions for defamation and intentional infliction of emotional distress against Cecil, et. al., in case 4:19-cv-01855 as well as the most recent filing against Tiana Lowe, et. al. Pursuant to Fed. R. Civ. P. 42(a), Judge Moore is designating this newest case as related (See Civil Cover Sheet with this attachment), as both cases involve a common question of law and/or fact, and both are filed by Judge Moore, the Plaintiff. The actions of the Defendants in both cases arose from misinformation widely disseminated with actual malice during the 2017 Special Senate Election where Judge Moore was the Republican Nominee. All Defendants with at a minimum a

reckless disregard for the truth published malicious defamatory representations to harm Plaintiff Moore's political campaigns and to severely damage him personally and professionally.

Beginning September of 2017 through December 2017, the defendants in *Cecil, et. al.*, utilized false and fabricated information to influence Alabama voters and to "hurt the campaign of Republican Roy Moore."¹ This contrived information, now known as the disinformation campaign "Project Birmingham" was widely reported and went viral after the *Washington Post* published false tales of sexual misconduct from secondhand, anonymous, unreliable and unverifiable sources. Nearly 16 months later on May 28, 2019, news reports speculating that Judge Moore may run for Senate again prompted the *Washington Examiner* to publish articles written by Tiana Lowe fueled by the same deceptive information disseminated sixteen months earlier. Ms. Lowe, with no additional or verifiable information, continued to repeat the same false and defamatory information with complete disregard for factual inaccuracies, for the sole purpose of causing continued damage to the reputation, good will and livelihood of Judge Moore.

This case at hand is related to *Cecil, et. al.* as the facts and circumstances related to the dissemination of false information are the same, and the presentation of the information obtained in discovery will be identical in both cases.

Respectfully submitted on this the 27th day of January, 2020.

¹ Craig Silverman, "New York Times Reporter Spoke at an Event Organized by Alabama Dirty Tricksters," Dec 27, 2018, <https://www.buzzfeednews.com/article/craigsilverman/alabama-dirty-tricksters-invited-a-new-york-times-reporter>.

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Pro Hac Vice Application

to be submitted

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CERTIFICATE OF SERVICE

I certify that I have served a copy of this complaint upon all parties hereto via first class mail postage prepaid, e-mail, or facsimile transmission

/s/ Melissa Isaak

Melissa Isaak